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PHOENIX MEDIA GROUP, INC.

SUITE 200 1407 SUMNER STREET ST. PAUL, MINNESOTA 55116-2645 (612) 699-1776

March 14, 1997

The Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

FC0. 17,097

Re:

Petition for Rule Making to Amend Section 73.202(b)

New FM Assignment at Lake City, Minnesota

Dear Secretary:

Transmitted herewith please find an original and four (4) copies of a Petition for Rule Making by Phoenix Media Group, Inc. to assign FM Channel 235A to Lake City, Minnesota, as that community's second local FM broadcast service. We affirm that we intend to apply for a construction permit for a new FM station to operate on this channel if it is assigned, and, if authorized, to promptly build the facility.

I hereby declare under penalty of perjury that the statements contained herein are true and correct to the best of my knowledge and belief.

Sincerely yours,

Steven T. Moravec

President

STM:glm Enclosures

Subscribed and sworn to before me this

14th day of march , 1997.

Virgiola L. Moravec, Notary Public

My Commission expires January 31, 2000.

VIRGINIA L. MORAVEC
NOTARY PUBLIC - MINNESOTA
RAMSEY COUNTY
My Commission Expires Jan. 31, 2000

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ENGINEERING REPORT

A PETITION FOR RULE MAKING TO AMEND THE FM TABLE OF ALLOTMENTS

TO ASSIGN FM CHANNEL 235A TO LAKE CITY, MINNESOTA

PHOENIX MEDIA GROUP, INC.

MARCH 1997

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ENGINEERING STATEMENT

This Engineering Statement and the attached Figure 1 have been prepared by B. Benjamin Evans, P.E. of Evans Associates, Consulting Communications Engineers in Thiensville, Wisconsin. This exhibit supports a petition by Phoenix Media Group, Inc., requesting modification of the Table of FM Allotments to specify FM Channel 235A at Lake City, Minnesota.

Evans Associates has been retained by Phoenix Media Group, Inc. ("petitioner") to prepare the engineering portion of a petition for rule making to assign FM Channel 235A to Lake City, Minnesota. The city of Lake City is located in Wabasha and Goodhue Counties in southeastern Minnesota. The population of Lake City in 1990 was 4,433 persons.

As a result of a frequency search conducted by this office, it has been determined that Channel 235A may be assigned to Lake City, Minnesota as a "drop-in" without affecting any existing or proposed FM authorizations. Therefore, it is requested that Section 73.202(b) of the FCC Rules and Regulations be amended in the following manner:

Community

Proposed

Lake City, Minnesota

235A

It is the petitioner's intention to apply for a construction permit to operate on the FM channel proposed herein, if it is assigned.

The reference point coordinates of Lake City are:

N. 44°-26'-48"; W. 92°-15'-48"



Engineering Statement - Page 2 Lake City, Minnesota

The assignment of Channel 235A to Lake City will meet all minimum distance separation requirements under the FCC rules if the transmitter site is located at least 10.5 kilometers southwest of the center of Lake City.

The transmitter site coordinates assumed for the purposes of this petition for rule making are:

N. 44°-22'-30"; W. 92°-21'-00"

From this location, the city of license coverage would be assured, even at modest Class A transmitting facilities.

Channel 235C2 at one time was allotted to Albert Lea, Minnesota as per a proposed modification by station KCPI, presently operating on Channel 237A at Albert Lea. Communications Properties, the licensee of KCPI, held a construction permit for the Class C2 facilities (FCC File No. BPH-881122IE), which would have precluded the assignment of 235A to Lake City; however, the facility was never built, and the Commission, by letter dated November 16, 1994, canceled the construction permit. Communications Properties no longer intends to take any further action regarding the Class C2. They have instead chosen to operate as a Class A on Channel 235 at their present site, and they hold a construction permit for same. As of December 27, 1996, the FM Table of Allotments was changed to reflect the fact that KCPI is assigned Channel 235A rather than 235C2. Therefore, Channel 235A is now available to be assigned to Lake City.

In view of the above, it is believed that the assignment of Channel 235A to Lake City, Minnesota would be in the public interest.



Engineering Statement - Page 3 Lake City, Minnesota

The foregoing statement and the attached figures are true and accurate to the best of my knowledge and belief.

B. Benjamin Evans, P.E.

March 11, 1997



ATTACHED FIGURE

Figure 1 ---- Allocation Study - FM Channel 235A, Lake City MN

.PRM-LakeCityMN

FIGURE 1



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Evans Associates 210 S. Main Street Thiensville, WI 53092 FM FREQUENCY ALLOCATION STUDY

Channel: 235A (94.9 MHz) 6 KW ERP Coordinates: 44 - 22 - 30 92 - 21 - 0 100 M HAAT Cl.A Spacing: 73.207 CH/CL-ZN HERP VERP -kw LATITUDE BEAR-to DIST-km CALL & CITY STATUS ST-CTRY FCC# (m)-HAAT MAXHAT HAMSL LONGTUDE -from-oT CLEAR-km -km KSTPFM St. Paul 233C 100. 100. BT 45 3 45 321.1° 98.7 94.5 LIC MN US BMLH910923KF 372 395 647 93 8 22 140.5° +4.2 •KSTP-FM, Inc.

 KCPI
 Φ Albert Lea
 235A
 3.5
 3.5
 43 38 0

 CP
 MN US
 BPH960530ID
 92 105 476 93 22 15

 43 38 0 225.1° 116.2 114.5 44.40 +1.6 Communications Properties, Inc. 45.8° 88.9 88.5 236C3 8.9 8.9 44 55 44 WORB Bloomer WI US BLH940113KC 166 200 460 91 32 31 LIC 226.3° +0.4 Bloomer Broadcasting Co., Inc. KAGEFM& Winona 237C3 11.0 11.0 41.5 44 2 31 124.5° 65.1 LIC MN US BLH920715KA 151 243 443 91 40 47 305.0° +23.6 •KAGE, Incorporated

>> *** CHANNEL SUITABLE FOR ASSIGNMENT *** <<